


ORIGINAL

CLERK OF DISTRICT COURT
NORTHERN DIST. OF TX
FORT WORTH DIVISION
FILED

4 - 23 CV - 054 - P
CAUSE NO. _____

2023 JAN 17 AM 8:51

DEPUTY CLERK 

Karen Spradlin
Plaintiff

§

**IN THE US NORTHERN
DISTRICT COURT**

§

§

v.

§

FORT WORTH, TEXAS

§

**Tarrant County Community
College**

§

US JUDICIAL DISTRICT

§

Defendant

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW Karen Spradlin, hereinafter "Plaintiff," and files this petition complaining of the City of Northern Texas, and specifically Tarrant County Community College, hereinafter "Defendant," and in support respectfully shows unto the Court the following:

DISCOVERY CONTROL PLAN LEVEL

1. Plaintiff intends that discovery be conducted under Discovery Level 2

PARTIES AND SERVICE

2. Plaintiff is an African American female of more than 56 years of age with whose address is 609 Adeline Dr., Burleson, TX 76028.

3. Defendant is a municipality company address: located at Tarrant County Community College Carol Bracken Legal Representative 300 Trinity Campus Circle, Fort Worth, Texas 76102., which parent company address is. where the Defendant may be served by stated address above, certified mail, return receipt requested in accordance with Section 17.024 of the Texas Civil Practice and Remedies Code.

JURISDICTION AND VENUE

4. The subject matter in controversy is within the jurisdictional of this Court.

5. Jurisdiction and Venue in Northern Texas District Court is proper in this cause pursuant to Middle, Tennessee, District Court Bishop vs. Woodbury, April 10, 2010.

STATEMENT OF FACTS

6. Plaintiff worked for Tarrant County Community College. November 2001 TO - approximately September 2021 when she was resigned from her Communications Manager over the Communications Division on the District level position. Plaintiff has an excellent performance history, including recognition for her work.

7. Plaintiff was one only women in the workplace that the Will Ivie committed a Discriminated against the plaintiff violating her Federal Civil Rights The Lilly Ledbetter Act of 2009, refusing to pay her equal pay as her white male supervisors. The Plaintiff was the only woman under his command. The plaintiff was a Commander of a Division as 5 other men both white and black who held the same professional positions until she out someone over the plaintiff further discriminating against the plaintiff after the plaintiff had been there 18 years. The defendant woman Nancy Williams threaten to shot the plaintiff and they colluded into continued harassment. The Tarrant County Community College failed to report to the Education Board with a threat of gun violence due to it being Jeanne Clery Act 1990, violating timely warning which is supposed to notify both the students and the Plaintiff which the Tarrant County Community College should notified both parties and the students.

9. Plaintiff took a constructive discharge medically retired as a result of the hostile work environment, hostile work environment, the stress and duress and disparate treatment to a woman.

10. Plaintiff received the letter from the EEOC in the mail on October 26, 2022, therefore making the deadline January 26, 2023.

11. The defendant, Will Ivie of Tarrant County Community College, harassed the plaintiff by disparate treatment refusing to pay her the pay equality for a woman for her supervisory and manger position causing undue stress and duress with the plaintiff. This is further a violation of her federal civil rights of a young woman who is in a protected class by Lilly Ledbetter Act of 2009 her.

12. There were continued harassment from her supervisor with intimidation that created

13. a hostile work environment which again is a violation of her federal civil rights, under the title 7 civil act of 1964, and 1991.

14. This Hostile work environment, discrimination, disparate Treatment, and the and a violation of the Lilly Ledbetter Act of 2009, has caused the plaintiff Karen Sprdlin mental that caused her to be diagnosed with Stress Disorder, Anxiety, Depression, and PTSD.

15. Plaintiff was harassed by supervisor from . when management stated, “ they have a no equal pay and a discrimination policy. The Tarrant County Community College violated their own policy to pay women equal as men in manager positions.

Plaintiff notified Tarrant County Community College and higher supervisor with the Human Resources Department on September 2021, approximately about filing a EEOC complaint and outside mediation would be sought. At that time, Plaintiff filed with the EEOC and was given a right to file this lawsuit.

CAUSE OF ACTION

17. Defendant violated Section 704(a) of Title VII of the Civil Rights Act of 1964 and the Libby Ledbetter Act of 2009 a woman who is in a protected class by discriminating against the Plaintiff, and Being threaten by a subordinate female to bring bodily harm to the plaintiff based Constructive discharge by hostile work environment.

DAMAGES

22. Plaintiff seeks compensatory damages in an amount of \$350,000.00 consistent with Chapter 21 of the Texas Labor Code of a defendant with more than 500 employees, including damages for lost back pay, future wages, pain and suffering, mental anguish, and loss of enjoyment of daily life.

23. Plaintiff seeks reasonable attorney's fees, court costs, expert fees reasonably incurred, and pre- and post-judgment interest at the maximum rate allowed, as permitted by Chapter 21 of the Texas Labor Code.

24. Plaintiff seeks equitable relief in the form of an injunction prohibiting Defendant from engaging in the unlawful employment practice and other additional equitable relief as may

JURY DEMAND

Plaintiff hereby demands a trial by jury.

PRAYER FOR RELIEF

THEREFORE, Plaintiff Karen Spradlin respectfully requests that Defendant be cited to appear and answer, and that on trial Plaintiff be awarded:

1. Judgment against Defendant for damages in an amount within the jurisdictional limits of Court and in accordance with the damages described herein;
2. Pre- and post-judgment interest on that amount at the maximum legal rate;
3. Reasonable attorney's fees, expert fees, and court costs; and
4. Equitable remedy within the Court's power; and
5. Any other relief to which Plaintiff may be entitled.
6. Plaintiff request reasonable damages in the amount of \$475,000 as a relief.

Respectfully submitted,



Karen Spradlin
609 Adeline Dr.
Burleson, TX 76028

Date: January 13, 2023

Certificate of Service

I, certify that on January 13, 2023 a true and correct copy of the above document was served on the Northern District of Texas, through its Walmart, INC. location at Carol Bracken, Tarrant County Community College, 300 Trinity Campus Circle, Fort Worth, Texas 76102 by United States certified mail with return receipt requested.



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